

06-CV-05264-ORD

The Honorable RONALD B. LEIGHTON
US Magistrate Judge KAREN L. STROMBOM

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

LENIER RENE AYERS,

Plaintiff,

v.

HENRY RICHARDS, et al.,

Defendants.

NO. C06-5264-RBL-KLS

STIPULATED SETTLEMENT

I. STIPULATED SETTLEMENT

The parties agree as follows: (1) that plaintiff Lenier Ayers agrees to the dismissal of this lawsuit and waiving any right he may have to appeal; (2) that within thirty (30) days following the Court's approval of this Stipulated Settlement defendants agree to pay to the Court's Registry the sum of TWELVE THOUSAND DOLLARS (\$12,000.00); (3) that plaintiff Ayers agrees to this settlement as a full and final resolution of all his claims asserted in this lawsuit; (4) that the Court may accordingly enter a consent judgment in plaintiff Ayers' favor in the amount of \$12,000.00 and dismiss his claims with prejudice; that the judgment amount shall be paid by the State of Washington on behalf of all defendants; and (5) that this Stipulated Settlement and Consent Judgment does not reflect an admission of

STIPULATED SETTLEMENT,
CONSENT JUDGMENT
NO. C06-5264-RBL-KLS

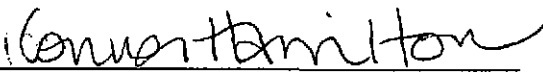
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ATTORNEY GENERAL OF WASHINGTON
7141 Cleanwater Dr SW
PO Box 40124
Olympia, WA 98504-0124
(360) 586-6565

1 liability by any defendant or the State of Washington; and (6) that plaintiff and defendants
2 each shall bear their own attorneys' fees and costs incurred in this matter;

3 Approved:

4 ROBERT M. MCKENNA
Attorney General

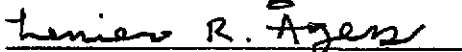
5 
6 DONNA J. HAMILTON, WSBA #26894
7 WILLIAM VAN HOOK, WSBA #33922
8 Assistant Attorneys General
Attorneys for Defendants

August 15
Signed: July, 2007

9 
10 JAMES A. SCHOENBERGER, WSBA #33603
11 Attorney for Plaintiff

Signed: August 8, 2007

12
13 I agree to the terms of the settlement described above and understand that this is a final
settlement of all my claims in this matter:

14 
15 LENIER AYERS
Plaintiff

Date Signed: August 8th, 2007

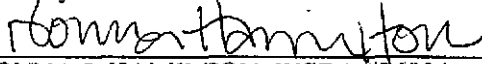
16 **II. CONSENT JUDGMENT**

17 Based on the stipulation of the parties, it is HEREBY ORDERED: (1) that a stipulated
18 judgment is entered in favor of plaintiff AYERS and against defendants in the amount of
19 \$12,000.00; (2) that plaintiff AYERS' claims are dismissed with prejudice; (3) that neither
20 defendants nor plaintiff AYERS shall recover costs or interest herein; (4) that payment of the
21 judgment amount shall be made to the Court's Registry; and (5) that upon receipt
22 of payment, the Court shall enter a satisfaction of judgment on plaintiff AYERS' behalf.

23 DATED this 30th day of August, 2007

24 
25 HONORABLE RONALD B. LEIGHTON
26 United States District Court Judge

1 Approved as to content and presented by:
2 ROBERT M. MCKENNA
3 Attorney General

4 
5 DONNA J. HAMILTON, WSBA #26894
6 WILLIAM VAN HOOK, WSBA #33922
7 Assistant Attorneys General
8 Attorneys for Defendants

Date Signed: 8/22/07

9 Approved as to form and content:

10 
11 JAMES A. SCHOENBERGER, WSBA #33603
12 Attorney for Plaintiff

Signed: Aug 20, 2007

13 DATED this ____ day of July, 2007.

14 ROBERT M. MCKENNA
15 Attorney General

16 DONNA J. HAMILTON, WSBA #26894
17 WILLIAM VAN HOOK, WSBA #33922
18 Assistant Attorneys General
19 Attorneys for Defendants